

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

In re:

Case No.: 6:19-00133  
Chapter 7

RICHARD BOURNE  
PATRICIA BOURNE

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DEBTOR

**TRUSTEE'S RESPONSE TO MOTION FOR RELIEF FROM STAY**

Arvind Mahendru, Trustee, files this Response to Bank of New York Mellon's Motion for Relief from Stay, in the above-captioned case and in support thereof states:

1. Bank of New York Mellon filed a Motion for Relief from Stay (Doc. No. 8).
2. Movant seeks to lift the stay with regard to a property located at 1031 Roanoke Court NE, Palm Bay, Florida 32907 (hereinafter "the Property"), purportedly so that they may pursue their in rem remedies in state court. The Trustee is actively attempting to sell the Property for the benefit of Bank of New York Mellon and the unsecured creditors of the estate. The Trustee believes that any action taken to foreclose on the Property would be adverse to the efforts of the Trustee and to that end opposes the Motion for Relief.

**WHEREFORE**, the Trustee respectfully requests that the Court deny the Motion for Relief from Stay and for any other relief as the Court deems just.

Respectfully submitted,

/s/ Arvind Mahendru  
Arvind Mahendru, Esq.  
5703 Red Bug Lake Rd. #284  
Winter Springs, FL 32708  
407-504-2462

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served by electronic delivery or US first class mail to all parties listed below on February 15, 2019.

Patricia Shaffer Bourne  
Richard Terry Bourne  
1031 Roanoke Court NE  
Palm Bay, FL 32907

Melissa Peat, Attorney via ECF

Bank of New York Mellon c/o Gavin Stewart, Esq. via ECF

/s/ Arvind Mahendru  
Arvind Mahendru